

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

---

UNITED STATES OF AMERICA,	)	
	)	
<i>Plaintiff,</i>	)	
	)	
v.	)	Case No. 1:04-cr-385 (LMB)
	)	
ALI AL-TIMIMI,	)	
	)	
<i>Defendant.</i>	)	
	)	

---

**MOTION FOR MODIFICATION OF CONDITIONAL RELEASE ORDER**

Defendant Dr. Ali Al-Timimi respectfully moves this Court to modify the conditions of his supervised release to allow Al-Timimi to leave his place of home confinement for three additional reasons: (1) to exercise outside of his mother's home by walking in the neighborhood (within geographical boundaries to be approved by his Probation Officer) between the hours of 9:30 a.m. and 11:00 a.m. each day; (2) to visit the gravesite of his father in Fredericksburg, Virginia; and (3) to meet with his former trial counsel, Edward MacMahon. In further support, the defense submits the accompanying memorandum at Dkt. No. 540.

The parties have conferred. As further detailed in the memorandum brief, the government has relayed that it takes no position on the present motion and defers to the discretion of the Court. *See id.* at ¶ 7. Accordingly, the defense waives oral argument under Local Criminal Rule 47(E) unless the Court finds that it would be useful.

Respectfully submitted,

/s/

---

Thomas Michael Huff, Virginia Bar No. 73587  
Thomas M. Huff, Attorney-at-Law  
P.O. Box 2248  
Leesburg, VA 20177  
Telephone: 703.665.3756  
Facsimile: 571.354.8985  
[thuff@law.gwu.edu](mailto:thuff@law.gwu.edu)

Jonathan Turley (*pro hac vice*)  
The George Washington University Law School  
2000 H Street, NW  
Washington, D.C. 20052  
(202) 994-7001 (telephone)  
(202) 508-6200 (facsimile)  
[jturley@law.gwu.edu](mailto:jturley@law.gwu.edu)

Attorneys for Defendant Ali Al-Timimi

Dated: July 7, 2021

**CERTIFICATE OF SERVICE**

I certify that on July 7, 2021, I will file the foregoing document on the CM/ECF system, which will then serve it by electronic notification on all parties of record. I further certify that I have conferred with this Court's designated Classified Information Security Officer, who has advised that the foregoing document may be filed on the public docket.

/s/

---

Thomas Michael Huff, Virginia Bar No. 73587  
Thomas M. Huff, Attorney-at-Law  
P.O. Box 2248  
Leesburg, VA 20177  
Telephone: 703.665.3756  
Facsimile: 571.354.8985  
[thuff@law.gwu.edu](mailto:thuff@law.gwu.edu)